

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-226-E**

IN RE: South Carolina Energy Freedom Act)
(House Bill 3659) Proceeding Related to) **INTERVENOR, SOUTH CAROLINA**
S.C. Code Ann. Section 58-37-40) **SOLAR BUSINESS ALLIANCE, INC.’S**
and Integrated Resource Plans for) **SECOND SET OF CONTINUING**
Dominion Energy South Carolina,) **INTERROGATORIES**
Incorporated)

TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY OF RECORD FOR DOMINION
ENERGY SOUTH CAROLINA, INCORPORATED:

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, “SCSBA”), pursuant to Reg. 103-835 and Rule 33, of the South Carolina Rules of Civil Procedure, hereby serves, **Dominion Energy South Carolina, Incorporated**, (hereinafter as, “DESC”) with Intervenor, South Carolina Solar Business Alliance, Inc.’s Second Set of Continuing Interrogatories, to be answered separately within seven (7) days from the date of service hereof. Please set forth DESC’s answers separately, after restating the question.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.
2. That all answers to the below Interrogatories shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the answers to these Interrogatories in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
5. That all exhibits be reduced to an 8 1/2" x 11" format.
6. That each Interrogatory be reproduced at the beginning of the answer thereto.

7. If the answer to any Interrogatory is that the information requested is not currently available, state when the information requested will become available.

8. These Interrogatories shall be deemed continuing, so as to require DESC to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

9. If a privilege not to answer an Interrogatory is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

10. If a refusal to answer an Interrogatory is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each Interrogatory on the basis of the entire knowledge of DESC, including information in the possession of DESC, or its consultants, representatives, agents, experts, partners, employees, independent contractors and attorneys, if any.

12. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for DESC's inability to answer.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **"You" or "your" shall refer to, DESC.**
2. **The conjunctions "and" and "or" shall be interpreted** in each and every instance as meaning "and/or" and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.

3. **“Document” shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of DESC and specifically includes the computer and or laptop computers utilized by Representatives of DESC. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between SCSBA and DESC.

4. **“Identify” or “identity”** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **“Identify” or “identity”** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in your possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

SECOND SET OF CONTINUING INTERROGATORIES

2-1. Refer to DESC Witness Neely's Rebuttal Testimony on pages 7 and 8, discussing DESC's use of revised escalation values for solar and battery storage. Was this update applied to solar PPA costs in the revised modeling? If so, please explain how this update was applied and how this impacted the results of the revised modeling. If not, please explain why it was not applied to solar PPA costs.

2-2. Regarding the work performed to prepare DESC's rebuttal testimony between 7/10/2020 and 8/28/2020, provide the following:

- a. The number of new PROSYM runs performed
- b. The number of newly created "Revenue Requirements" Excel spreadsheets
- c. The number of previously created but revised "Revenue Requirements" Excel spreadsheets
- d. The number of newly created Expansion Plan Excel spreadsheets
- e. The number of previously created but revised Expansion Plan Excel spreadsheets

2-3. Please identify which resource plan was selected by the Company in the IRP Supplement as the most reasonable and prudent means of meeting energy and capacity needs at this time, and describe in detail the basis for this selection, including but not limited to how the cost results, plan rankings, average rankings, and CO2 results across all scenarios reported on Exhibit EHB-3 pp. 10-16, and any other data, analysis, or assumptions were considered.

2-4. Please describe in detail how DESC considered, in the IRP Supplement, each of the factors listed in S.C. Code § 58-37-40(C)(2)(a)-(g) for each resource plan, and describe how the revised IRP Supplement "balances" these factors in the selection of the resource plan.

2-5. Refer to the Conclusions and Recommendations section on pages 52-56 of SCSBA Witness Sercy's direct testimony on DESC's 2020 IRP filed on July 10, 2020, including the 19 total numbered recommendations (as well as all subparts) and the additional explanatory text in that section. For each recommendation made by Witness Sercy, please provide identify (with page and line citations) the Company's response to the recommendation in its Rebuttal Testimony and Supplemental IRP.

[Signature Page Follows]

Respectfully Submitted,

/s/Richard L. Whitt
Whitt Law Firm, LLC
401 Western Lane, Suite E
Irmo, South Carolina, 29063
(803) 995-7719

Benjamin L. Snowden
Kilpatrick Townsend & Stockton, LLP,
4208 Six Forks Road, Suite 1400
Raleigh, North Carolina 27609
(919) 420-1719

*Both as Counsel for the South Carolina Solar
Business Alliance, Inc.*

September 8, 2020
Irmo, South Carolina